

Chasing Geographical and Social Mobility: The motivations of Nigerian madams to enter indentured relationships

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Abstract

This article draws from interviews with Nigerian women convicted of trafficking for sexual exploitation in Italy to challenge the simplistic public narrative of traffickers as ruthless foreign men who coerce naïve women into migration and sex work. Madams' narratives shed light on a reality of trafficking where both traffickers and victims share similar desires to overcome constraints imposed on their geographical and social mobility through their migration to Europe. Therefore, the article calls for the inclusion of traffickers' perspectives into the knowledge on human trafficking, which is mainly victim-centred and justifies the current anti-trafficking approach aimed at victims' protection and traffickers' punishment. In the research context, taking into consideration the perspectives of all trafficking actors involved suggests the need to rethink Nigerian women's indentured migration to Europe through sex work (and policies around it) in terms of attempts to achieve geographical and social mobility rather than transnational criminal activities. Finally, the article provides recommendations on how to address these issues both within the current anti-trafficking policy domain and beyond it, by calling for more open borders.

Keywords: trafficking, madams, traffickers, sex work, Nigeria

Please cite this article as: M Rizzotti, 'Chasing Geographical and Social Mobility: The motivations of Nigerian madams to enter indentured relationships', *Anti-Trafficking Review*, issue 18, 2022, pp. 49-66, <https://doi.org/10.14197/atr.201222184>

Introduction

Research in the field of human trafficking is mainly victim-centred and often conducted in the context of assistance and social protection.¹ This focus is mirrored in the dominant anti-trafficking approach employed by most national governments and informed by the United Nations² as well as by the United States (US) government's 3P framework: the prevention of trafficking from taking place, the protection of victims, and the prosecution of traffickers.³ It follows a popular simplistic narrative, often amplified by the media and public discourse, which deems victims to be naïve women in need of rescue from ruthless male traffickers.⁴

However, this narrative does not always grasp the reality of trafficking actors, as a recent report of the United Nations Office on Drugs and Crime (UNODC) shows.⁵ According to the research, more than 30 per cent of individuals investigated, prosecuted, and sentenced for trafficking for sexual exploitation worldwide are women. The context of trafficking for sexual purposes from Nigeria to Europe is emblematic of this trend. Previous research with identified

¹ R Surtees, *Traffickers and Trafficking: Challenges in researching human traffickers and trafficking operations*, International Organization for Migration (IOM) and NEXUS Institute, Geneva, 2014, http://publications.iom.int/system/files/pdf/nexus_traffickers_and_trafficking_final_web.pdf.

² UN General Assembly, *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime*, 15 November 2000 (Trafficking Protocol).

³ Office to Monitor and Combat Trafficking in Persons, '3Ps: Prosecution, Protection, and Prevention', U.S. Department of State, n.d., retrieved 3 May 2021, <https://www.state.gov/3ps-prosecution-protection-and-prevention>.

⁴ O Spaggiari, 'Escape: The woman who brought her trafficker to justice', *The Guardian*, 27 August 2020, <https://www.theguardian.com/world/2020/aug/27/nigeria-italy-human-trafficking-sex-workers-exploitation-justice>; Redazione ANSA, 'Nigerian Trafficking, Prostitution Gang', *ANSA*, 14 November 2019, https://www.ansa.it/english/news/general_news/2019/11/14/nigerian-trafficking-prostitution-gang_9694ec77-f857-4efc-b43e-668228022d8a.html; K Romy, 'In Europe, Nigerian Prostitutes Are Held Captive by "Black Magic"', *SwissInfo*, 7 August 2018, https://www.swissinfo.ch/eng/human-trafficking_in-europe--nigerian-prostitutes-are-held-captive-by--black-magic-/44295624; R Andrijasevic and N Mai, 'Editorial: Trafficking (in) Representations: Understanding the recurring appeal of victimhood and slavery in neoliberal times', *Anti-Trafficking Review*, issue 7, 2016, pp. 1–10, <https://doi.org/10.14197/atr.20121771>.

⁵ I Chatzis et al., *Female Victims of Trafficking for Sexual Exploitation as Defendants: A case law analysis*, United Nations Office on Drugs and Crime (UNODC), Vienna, 2020, https://www.unodc.org/documents/human-trafficking/2020/final_Female_victims_of_trafficking_for_sexual_exploitation_as_defendants.pdf.

victims⁶ describes the phenomenon in the following terms: Nigerian women's migration to Europe is usually sponsored by other Nigerian women (usually referred to by identified victims as 'sponsors'⁷ or 'madams'⁸) who facilitate and pay upfront for the women's travel. Once in Europe, Nigerian migrants are required to engage in sex work often under constrained and exploitative conditions until the travel debt is repaid.

Most research on the topic has been conducted by Western researchers and is focused on the coercive nature of the relationship, which binds Nigerian migrants-to-be to their madams.⁹ Usually, prior to the women's departure, the two parties make an agreement, which is sanctioned by a *juju* ritual¹⁰ and supervised by a *native doctor*.¹¹ During the oath, both parties swear that they will keep their promises, sanctioning the beginning of the indentured relationship. Madams swear that they will facilitate the migration of co-nationals to Europe, and migrants-to-be swear that they will repay their travel debt (which is often around EUR 25,000–40,000)

⁶ S Taliani, *Il Tempo della Disobbedienza: Per un'antropologia della migrazione*, Ombre Corte, Verona, 2019; P Testai, 'Debt as a Route to Modern Slavery in the Discourse on "Sex Trafficking": Myth or reality?', *Human Security Journal*, vol. 6, issue 1, 2008, pp. 68–77.

⁷ I Peano, 'Bondage and Help: Genealogies and hopes in trafficking from Nigeria to Italy', in J Quirk and D Wigneswaran (eds.), *Slavery, Migration and Contemporary Bondage in Africa*, Africa World Press, Trenton, NJ, 2013, pp. 225–251.

⁸ N Mai, "'Too Much Suffering": Understanding the interplay between migration, bounded exploitation and trafficking through Nigerian sex workers' experiences', *Sociological Research Online*, vol. 21, issue 4, 2016, pp. 159–172, <https://doi.org/10.5153/sro.4158>; S Plambech, *Points of Departure: Migration control and anti-trafficking in the lives of Nigerian sex worker migrants after deportation from Europe*, PhD Dissertation, Department of Anthropology, University of Copenhagen, 2014; such as in the case of this research sample.

⁹ C S Baarda, 'Human Trafficking for Sexual Exploitation from Nigeria into Western Europe: The role of voodoo rituals in the functioning of a criminal network', *European Journal of Criminology*, vol. 13, issue 2, 2016, pp. 257–273, <https://doi.org/10.1177/1477370815617188>; F Carchedi, *Trafficking of Nigerian Girls in Italy: The data, the stories, the social services*, UNICRI, Rome, 2010, http://unicri.it/sites/default/files/2019-10/trafficking_nigeria-italy.pdf.

¹⁰ In 2018, Oba Ewuare II, the spiritual chief of Edo State (where the majority of Nigerian identified victims come from) ordered all native doctors to revoke the oaths placed on victims of trafficking. This resulted in a decrease of the coercive power which bound madams to migrants (Taliani, 2019). However, my research participants had repaid their travel debt before the Oba's edict, and thus, the effects the Oba's communication had on trafficking practices are not discussed in this article.

¹¹ This term is usually employed by Nigerian women to refer to those men who administer the ritual. See, for instance: S Taliani, 'Coercion, Fetishes and Suffering in the Daily Lives of Young Nigerian Women in Italy', *Africa*, vol. 82, issue 4, 2012, pp. 579–608, <https://doi.org/10.1017/S0001972012000514>.

without reporting their sponsors to the authorities. Often, Nigerian migrants are told during the ritual that failure to honour the agreement will result in their or their relatives' death. As the agreement is bound to the debt repayment, once Nigerian migrants have repaid the travel debt, the oath is fulfilled and they can start an independent life in Europe.¹²

To better understand trafficking and indentured sex work migration from Nigeria to Italy, it is useful to contextualise it within longstanding forms of Nigerian autonomous female migration. As Kastner notes drawing on Ikpe's work,¹³ indentured sex work migration is one of the many patterns that already established forms of Nigerian mobility took after Nigerian independence. In the 1930s, when the country was still a British colony, the empire had witnessed the migration of Nigerian women to neighbouring areas of the Gold Coast Colony to sell sex to colonisers.¹⁴ Thanks to the remittances that these women were sending back to their hometowns, migrants' families started to build new houses contributing to the urban expansions of those areas.

After Nigerian independence, in the 1980s, as part of post-colonial connections, the Italian construction company Dunmez opened several offices in Benin City, Edo State. Italian men moved to the company's Nigerian branch and some married Nigerian women with whom they travelled back to Italy. This phenomenon informed many other Nigerian women's migration plans as they recognised an opportunity to travel to Europe as their co-nationals did.¹⁵ Some of the women independently moved to Italy as sex workers, attracted by the potential of high incomes. Due to the increasingly strict European border controls and limited freedom of movement following the establishment of the Schengen area in 1995,¹⁶ those women who were already in Italy started to facilitate the travel of co-nationals who wanted to migrate.

¹² J O'Connell Davidson, 'Troubling Freedom: Migration, debt and, modern slavery', *Migration Studies*, vol. 1, issue 2, 2013, pp. 176–195, <https://doi.org/10.1093/migration/mns002>.

¹³ K Kastner, 'Moving Relationships: Family ties of Nigerian migrants on their way to Europe', *African and Black Diaspora: An International Journal*, vol. 3, issue 1, 2010, pp. 17–34, <https://doi.org/10.1080/17528630903319813>.

¹⁴ Taliani, 2019, p. 2.

¹⁵ O C Osezua, 'Cross-border Sex Trade, Transnational Remittances and Changing Family Structures Among Benin People of Southern Nigeria', *Gender & Behaviour*, vol. 9, issue 2, 2011, pp. 4276–4297, <https://doi.org/10.4314/gab.v9i2.72200>.

¹⁶ P Testai, "'From the (E)migrant to the (Im)migrant": The Italian nation-state and its migration rhetoric and history', *Transnational Social Review*, vol. 5, issue 1, 2015, pp. 24–38, <https://doi.org/10.1080/21931674.2015.1016710>.

In the early 2000s, these migration patterns, which in the meantime had developed into indentured sex work migration relationships, became known as human trafficking, following the adoption of the UN Trafficking Protocol. The Trafficking Protocol, adopted in tandem with the Smuggling Protocol,¹⁷ as part of the *Convention Against Transnational Organized Crime*, criminalises the actions of those actors who either coerce migrants into exploitation or facilitate their unauthorised border-crossing. The twinning of the two Protocols under the same Convention makes sense from the point of view of EU governments, which consider traffickers and smugglers' actions to violate their right to control borders and decide who can cross them.¹⁸ By stating that unauthorised border crossings and mobility facilitation are the result of the actions of criminal facilitators, EU governments have misused these instruments to police non-Western citizens' movement and intensify borders control as part of crime prevention strategies.

By portraying some individuals as in need of rescue from their ruthless traffickers, EU governments successfully obscure the agency of migrants, especially women and children, who cross European borders without authorisation. In this way, States create hostile migration regimes which endanger (non-Western) migrants in the first place, as they are left to rely on unauthorised travel facilitators with whom they often enter indentured relationships.¹⁹ Thus, the attention is re-centred on a specific category of individuals, legally identified as traffickers, who are blamed for the suffering of people on the move.²⁰ Therefore, the madams who act as their co-nationals' travel facilitators are criminalised, and the Nigerian migrants pitied.

Nigerian migrants are not always aware of the harsh conditions of indentured sex work migration but ultimately, often choose to endure them to repay their debt and start a new life in Europe.²¹ Within this context, previous research with Nigerian identified victims already challenged their public representation as coerced and naïve victims by acknowledging that women may voluntarily enter and remain in indentured relationships with their sponsors. Even if much research in the context of trafficking from Nigeria to Europe has been conducted with identified victims,²² less is known about the character of madams. The few

¹⁷ UN General Assembly, *Protocol Against the Smuggling of Migrants by Land, Sea, and Air*, 15 November 2000 (Smuggling Protocol).

¹⁸ O'Connell Davidson, 2013, p. 3.

¹⁹ N Sharma, 'Anti-Trafficking Rhetoric and the Making of a Global Apartheid', *NWSA Journal*, vol. 17, issue 3, 2005, pp. 88–111, <https://doi.org/10.1353/nwsa.2005.0069>.

²⁰ J O'Connell Davidson, 'Editorial: The Presence of the Past: Lessons of history for anti-trafficking work', *Anti-Trafficking Review*, issue 9, 2017, pp. 1–12, <https://doi.org/10.14197/atr.20121791>.

²¹ O'Connell Davidson, 2013, p. 3.

²² Mai, 'Too Much Suffering', p. 2; Plambech, p. 2.

studies²³ conducted with Nigerian sponsors suggest that they may be former victims of trafficking, partly resonating with similar studies in different contexts.²⁴ In this regard, previous research found that individuals are usually trafficked by community members and thus, traffickers may experience similar structural and migration limitations to those experienced by victims. However, these findings do not necessarily imply that traffickers have experiences of past victimisation, which seems to be the case of Nigerian sponsors.²⁵

Drawing from original interviews with convicted madams, this paper argues that both sponsors and identified victims may voluntarily enter indentured sex work migration relationships to reach Europe and therefore, they should be primarily understood as migrant sex workers. In the research context, understanding trafficking as indentured sex work migration²⁶ allows exploration of the ways in which migrants organise their labour within a context of international migration.

Listening to convicted women's narratives, their involvement can be divided into two different time periods: 1) when a sponsor facilitated their travel to and sex work in Italy resembling Nigerian identified victims' narratives in previous research;²⁷ 2) when they themselves started to facilitate the travel and to manage the sex work of other fellow countrywomen. Therefore, convicted Nigerian women's experiences of initial involvement could be classified along with those of Nigerian identified victims interviewed in previous studies, making the research sample a specific category, which transcends the character of either trafficker or

²³ See, for example: E Lo Iacono 'Victims, Sex Workers and Perpetrators: Gray areas in the trafficking of Nigerian women', *Trends in Organized Crime*, vol. 17, issue 1–2, 2014, pp. 110–128, <https://doi.org/10.1007/s12117-014-9212-1>; M Mancuso, 'Not All Madams Have a Central Role: Analysis of a Nigerian sex trafficking network', *Trends in Organized Crime*, vol. 17, issue 1–2, 2013, pp. 66–88, <https://doi.org/10.1007/s12117-013-9199-z>.

²⁴ A L A Baxter, 'When the Line Between Victimization and Criminalization Blurs: The victim-offender overlap observed in female offenders in cases of trafficking in persons for sexual exploitation in Australia', *Journal of Human Trafficking*, vol. 6, issue 3, 2020, pp. 327–338, <https://doi.org/10.1080/23322705.2019.1578579>; E Denton, 'Anatomy of Offending: Human trafficking in the United States, 2006–2011', *Journal of Human Trafficking*, vol. 2, issue 1, 2016, pp. 32–62, <https://doi.org/10.1080/23322705.2016.1136540>; R Broad, 'A Vile and Violent Thing: Female traffickers and the criminal justice response', *The British Journal of Criminology*, vol. 55, issue 6, 2015, pp. 1058–1075, <https://doi.org/10.1093/bjc/azv072>; J Kienast, M Lakner, and A Neulet, *The Role of Female Offenders in Sex Trafficking Organizations*, RAUN, 2014, http://www.ra-un.org/uploads/4/7/5/4/47544571/the_role_of_female_offenders_in_sex_trafficking_organizations.pdf.

²⁵ Mancuso, p. 5.

²⁶ Plambech, p. 2.

²⁷ O'Connell Davidson, 2013, p. 3.

victim and places attention on their experiences of migration.

For this reason, notwithstanding that State criminal justice procedures have classified these women as traffickers, I do not use the term *trafficker* in this paper but employ Nigerian women's terminology of 'sponsor' and 'madam'. Similarly, I do not use the term *victim* but migrant sex workers in order to more precisely illuminate the reality of their relationships. Only when discussing previous studies, I use the term 'identified victim' in order to be faithful to previous researchers' terminology and, at the same time, to highlight the contextual nature of the administrative label rather than implying that Nigerian women understood themselves as such.²⁸ Furthermore, as I discuss below, madams' accounts of their experiences invite a re-think of anti-trafficking interventions, which should avoid the dualistic understandings of ruthless perpetrator—naïve victim.²⁹ Instead, these research findings point to the necessity to take into account the nuanced reality of 'trafficking' relationships on the Nigeria-Italy route, which happen within a context of migration, and to design alternative interventions to hostile migration regimes and polarising anti-trafficking policies.

Methodology

This paper draws on doctoral research fieldwork I conducted between April and November 2019 in Italy. I conducted semi-structured interviews in one Italian prison with seven Nigerian women convicted of trafficking, as well as with six Nigerian identified victims taking part in support programmes run by Italian NGOs, and three Nigerian cross-cultural mediators who had also been identified as victims. I also held semi-structured interviews with prosecutors, prison educators, and NGO professionals to shed light on the discrepancies between trafficking actors' social world and its representation in the anti-trafficking domain. In total, I conducted 31 interviews, of which 16 were with Nigerian women who were once involved in trafficking from Nigeria to Italy and 15 with Italian key informants. For the purpose of this article, which aims to contribute to the knowledge about perpetrators, I mainly draw findings from interviews conducted with the seven convicted women.

²⁸ Administrative categories of 'traffickers' and 'victims' do not always mean much to trafficking actors and migrants. See: L. De Noronha, "'Foreign Criminals'" and Victims of Trafficking: Fantasies, categories, and control', in J O'Connell Davidson and N Howard (eds.), *Migration and Mobility. Beyond Trafficking and Slavery short course Vol. 5*, openDemocracy, 2015, pp. 85–88.

²⁹ Baarda, p. 2.

After gaining the appropriate ethics clearance by the University of Leicester and by the prison's governor, I introduced the study to eight potential participants convicted of trafficking under Art. 601 of the Italian Criminal Code. I approached potential participants during their association time³⁰ and explained the research to them. Seven women agreed to participate in the study and I conducted the interviews in a meeting room in the institution's female pavilion. The interviews were conducted either in English or in Italian, in accordance with participants' preferences and fluency, and they were assigned pseudonyms. When participants agreed, interviews were audio recorded. No interpreter (or any member of staff) attended the interview but only the participant and I were present in the room. Most participants were between 22 and 35 years of age (and one was over 60). At the time of the fieldwork, most had been in prison for several months and were unsure about the length of their sentence.

I transcribed the interviews and analysed emerging data through thematic analysis³¹ to report, identify, and explore emerging themes. Codes included participants' perceptions of trafficking, Nigerian women's agency, themes related to participants' motivations to become involved, and migration plans. The research findings represent a bridge between sociological, critical migration studies, and criminological theoretical frameworks, suggesting that Nigerian women's involvement should be understood within a context of global inequality, strict migration regimes, and crimmigration³² interventions.

Lastly, considerations should be given to the context within which interviews were conducted, the difference in positionalities between the researcher and participants, and their impact on participants' narratives. Although I explained the academic nature of the research to the women before the interview, there is always the risk that incarcerated participants confuse researchers with institutional authorities,³³ resulting in an interview setting characterised by power imbalance between the research parties. This is especially true when research is carried out with unauthorised migrants—as most of the Nigerian women in the research sample were—because they have little control over the ways in which they are represented in the public arena. Therefore, as researchers are in charge of truthfully amplifying participants' voices (to the extent differences in positionalities allow), participants may not trust them and may shape or omit details from their

³⁰ This is the time prisoners are allowed to be outside of their cells.

³¹ V Braun and V Clarke, 'Using Thematic Analysis in Psychology', *Qualitative Research in Psychology*, vol. 3, issue 2, 2006, pp. 77–101, <https://doi.org/10.1191/1478088706qp0630a>.

³² K F Aas and M Bosworth, *The Borders of Punishment: Migration, citizenship, and social exclusion*, Oxford University Press, Oxford, 2013.

³³ M Cowburn, L Gelsthorpe, and A Wahidin, *Research Ethics in Criminology: Dilemmas, issues and solutions*, Routledge, London, 2016.

narratives.³⁴

In the context of human trafficking, which is a highly charged political issue, my research participants may not have shared with me all details of their stories and may have shaped their accounts to represent themselves positively. Furthermore, social desirability may have played a role in shaping convicted madams' accounts. This is especially likely if participants understood me as their only way to communicate with mainstream society where their voices are often neglected by a public arena mainly concerned with identified victims' testimonies and perpetrators' punishment.³⁵ As I argue throughout the article, it is within this context that Nigerian madams may have been driven by their desire to be accepted by Italian society and thus, their accounts should also be considered as part of their livelihood strategies as migrants.³⁶

With these considerations in mind, the next sections explore interviewed madams' narratives of their involvement in human trafficking.

Madams' Motivations to Become Involved in Trafficking

When convicted women were asked about their motivations to become involved in trafficking, they referred to their initial migration to Europe through indentured relationships with other sponsors. In this context, participants mainly resorted to two different explanations: 1) the socioeconomic hardship they experienced in Nigeria, which was strongly intertwined with the social expectations of their community; and 2) their intention to migrate to Italy to facilitate the travel and manage the sex work of co-nationals. In the next two sections, I discuss each of these themes from interviewed women's perspectives and contextualise them within their perceptions of trafficking. Convicted women framed their trafficking experiences within a migration discourse and understood their involvement as a response to strict migration regimes, which impose constraints on their geographical and social mobility. Contextualising sponsors' narratives within this framework is crucial to understand the ways in which migratory projects and compromises of doing sex work shaped Nigerian women's decisions to

³⁴ F Düvell, A Triandafyllidou, and B Vollmer, 'Ethical Issues in Irregular Migration Research in Europe', *Population, Place and Space*, issue 3, 2009, pp. 227–239, <https://doi.org/10.1002/psp.590>.

³⁵ R Surtees, p. 1.

³⁶ As further discussed in my doctoral thesis: M Rizzotti, *ASK THEM ALL: Exploring the ways in which Nigerian madams and Nigerian migrant sex workers challenge their immobilities*, Forthcoming Doctoral Dissertation, Department of Criminology, University of Leicester, Leicester, 2022.

enter indentured relationships with co-nationals both as migrant sex workers and as madams.

Socioeconomic Hardship and Social Expectations

When madams discussed their motivations to become involved in trafficking, all but one explained that they had first left Nigeria with the help of somebody. Only after, when they had repaid their travel debt through sex work in Italy, did they start to manage the travel and sex work of fellow countrywomen. All of them explained that they wanted to leave Nigeria because, as one said, the ‘sufferance [sic] was too much’. They spoke about the socioeconomic hardships they experienced in their hometowns, which led them to take the decision to migrate. Most participants also explained that they actively looked for people who could help them reach Europe.

The economic hardship was often intertwined with social and community expectations. All the women described themselves as eldest daughters in their family and as such, they were expected to take care of their household and siblings. For example, Susan, 32 years old, stated: ‘I needed to go to Europe to take care of my siblings, my mum because I do not want them to suffer! So, this is why I am here’. Participants explained that once in Italy, they engaged in sex work to repay the travel debt as well as to send remittances back home.

In this regard, most interviewed madams referred to sex work as a temporary compromise in order to be in Europe. Five of the seven women explained that they knew upon their departure that they would have to engage in sex work in Europe and had agreed to it as long as it allowed them to financially support their family. The remaining two were not aware of the nature of the job awaiting them in Italy. Yet, when they arrived, they perceived sex work as the only job they could have as unauthorised migrants. For example, Last explained: ‘I wish I had documents... I would tell the person who brought me from Nigeria: “wait, I don’t work in the streets [sex work], let me work, if I had a [different] job, I would pay your money... every month...” but no documents, nothing, nothing...’.

Only when sex work was no longer useful to repay their debt and achieve their migration plan, did it become extremely hard to tolerate. For example, in Susan’s case, perceptions around sex work were charged with resentment as her conviction resulted in losing all the money she had earned and thus, she felt that: ‘So, any harm I did to my body, I have been suffering for nothing’. Susan’s narrative was similar to that of other incarcerated participants who explained that sex work was a compromise to achieve their migration plan and being arrested meant that they could not financially support their family anymore.

The women’s accounts were similar to those of identified victims whose migration plans to Europe were pursued through an indentured relationship with their

sponsors.³⁷ In previous research, Nigerian identified victims explained that they entered indentured agreements in order to help their family and overcome the socioeconomic hardship experienced in Nigeria. In this regard, Peano notes that Nigerian women's hopes for their migration should be considered 'a quest for personal success, measured mainly in economic terms and in their capacity, in turn, to support dependents or kin, which had to involve a certain degree of risk and luck'.³⁸ In practice, 'risk' in Nigerian women's migration represents dangerous travels through unauthorised routes as well as harsh and constraining relationships with their madams. However, migration projects could also represent 'luck' as they may prove successful. This was the case of Blessing, a convicted woman, who explained: 'I did my part, I bought a house in Nigeria, I built the house because the person gave me the opportunity to come here [to Italy]. It worked out, for me it was not bad!'. Blessing's story demonstrates how indentured sex work relationships may be an opportunity which luckily 'works out' and enables women to move both socially and geographically.

Madams' narratives challenge simplified representations of ruthless perpetrators who coerce naïve victims into movement and exploitation. These considerations are not meant to deny the exploitative and coercive nature of women's relationship to their sponsors, but to shed light on the fallacy of neatly polarising trafficking actors, as sponsors too had migrated through indentured relationships. Within this context, madams illuminated a 'trafficking' reality, which may not only be constraining and coercive but also enabling of livelihood goals. According to participants' narratives, Nigerian women have virtually no alternatives to attain such livelihood goals in Nigeria and thus, they may accept the risks and harsh conditions deriving from indentured relationships.

In line with participants' accounts, previous research has shown that Nigerian identified victims usually have some degree of agency, challenging the category of naïve and coerced women (what Hoyle *et al.* refer to as 'the ideal victim of trafficking').³⁹ In this research context, convicted participants illuminated their initial involvement in migration and sex work, which resembles that of many Nigerian identified victims.⁴⁰ Importantly, some of the identified victims I spoke with did not consider madams as ruthless criminals either. For example, Olo, highlighting the enablement aspect of her relationship with the sponsor, said: 'You are offered your opportunity, you can grab yours. It is your own business. Do you understand? At the same time, I am happy that I am here. If it was not

³⁷ Mai, 'Too Much Suffering', p. 2; Plambech, p. 2.

³⁸ Peano, p. 2.

³⁹ C Hoyle, M Bosworth, and M Dempsey, 'Labelling the Victims of Sex Trafficking: Exploring the borderland between rhetoric and reality', *Social & Legal Studies*, vol. 20, issue 3, 2011, pp. 313–329, <https://doi.org/10.1177/0964663911405394>.

⁴⁰ O'Connell Davidson, 2013, p. 3.

for the lady I would not be here.’ Like their co-nationals, convicted participants voluntarily entered indentured relationships with their sponsors to migrate to Europe and financially support their family, as they were expected to by their communities. Madams’ narratives further confirmed that sponsors’ involvement, as well as that of other Nigerian women, is better understood within their individual desire and that of their family to achieve some mobility, rather than as part of ruthless criminal organisations’ activities.

Bringing Somebody to Europe

Only one convicted participant, Joy, explained that she had decided to migrate to Europe for sex work because she wanted to *bring* other people to Italy as well as to make money out of it:

Joy: *But I asked many people, I want to go to Italy, I want to be peaceful, I want to make money.*

Researcher: *Ah, because you make more money [in Italy]?*

Joy: *Yes, to help somebody, to bring them here, to bring also my family.*

Similar to other convicted participants, Joy perceived indentured migration to Italy as the answer to her and her family’s socioeconomic hardship. However, unlike other interviewed madams, she became involved and decided to migrate as part of her future plan to enable other family members’ travel to Italy. According to her, facilitating relatives’ mobility to Italy would directly improve their financial situation, too. Therefore, in Joy’s case, indentured sex work migration would directly work as a livelihood strategy for her, either as migrant or sponsor, and for her family members, either by receiving Joy’s remittances or by becoming migrants themselves.

Interviewed madams, similarly to the identified victims I interviewed, never employed the term ‘trafficking’ (or *tratta* in Italian) to refer either to their initial involvement or their activities as sponsors. Rather, they used phrases such as ‘being helped’ or ‘being brought’ as well as ‘helping somebody’ or ‘bringing somebody’ to Europe. For example, when explaining the events which led to her arrest, Amanda said, ‘[I told my mum] Mum, this is not about respect, if I am *bringing* your sister and her sons here, I will end up in prison and I will suffer!’. Similarly, Joy explained how indentured sex work migration relationships work: ‘*Bringing* somebody to Italy *helps also me* [because she earns money from it]. So, we can *help* each other; she *helps* me, I *help* her’ [all emphases added]. Joy framed her actions within dimensions of help and enablement among social circles, resonating with other studies conducted with people smugglers from non-Western countries.⁴¹

⁴¹ F Adugna, P Deshingkar, and A Atnafu, ‘Human Smuggling from Wollo, Ethiopia to Saudi Arabia: Askoblay criminals or enablers of dreams?’, *Public Anthropologist*, vol. 3, issue 1, 2021, pp. 32–55, <https://doi.org/10.1163/25891715-03010003>.

Participants' tendency to refer to their actions in terms of 'helping somebody' or 'bringing somebody' to Europe, and to frame trafficking within the wider context of mobility enablement, may have worked as a strategy to undermine the criminal nature of their involvement and be perceived positively by the researcher. Resorting to such terminology assisted sponsors to successfully take distance from the potential harm and situations of violence that are associated with international sex work management and trafficking.⁴² Interviewed madams successfully denied responsibility for any harm experienced by migrants, while only shedding light on the enablement aspect of their actions and agreements.

Notwithstanding the role that social desirability may have played in participants' perceptions of trafficking, their accounts should also be understood as part of their desire of mobility and life in Italy. The women explained that they wanted to remain in Italy after their release from prison, supporting the fact that they initially entered indentured relationships as a response to their desire for a life in Europe. Interestingly, a few explained that the reason why they did not want to go back home was related to the fact that in Nigeria, there is 'no freedom'. In this regard, Joy explained: 'Too much mess in Africa. There is not electricity, there is not water, there is not food, no freedom as here in Italy'.

Talking about human trafficking as a way to achieve 'freedom' seems paradoxical if we consider that participants were interviewed inside a prison and that the crime is regarded as the deprivation of individuals' freedom. As O'Connell Davidson argues, the concept of human trafficking is grounded in the liberal tendency to perceive the world in terms of dualisms such as voluntarily/forced and free/enslaved.⁴³ Within this context, the definition of the phenomenon is inscribed in the post-Enlightenment notion that people are naturally born free and thus, any violation of individual freedom is understood as conducive to slavery. This way to understand human action informs a perception of migration where people on the move can be discerned as either forced to move by their traffickers in slavery-like situations or as agents who exercise self-sovereignty. However, such dualism does not take into account the many structural and social constraints within which people move, exercise agency, and make decisions. In this research context, these constraints were at least partly due to hostile migration regimes, which were found to impinge on participants' opportunities of social and geographical mobility.

⁴² N Mai 'Embodied Cosmopolitanisms: The subjective mobility of migrants working in the global sex industry', *Gender, Place & Culture*, vol. 20, issue 1, 2013, pp. 107–124, <https://doi.org/10.1080/0966369X.2011.649350>; O'Connell Davidson, 2013, p. 3.

⁴³ O'Connell Davidson, 2013, p. 3.

Rethinking Trafficking and Anti-Trafficking Interventions

As these research findings show, in the context of trafficking from Nigeria to Italy, madams' initial involvement was similar to that of identified victims who entered indentured relationships with co-nationals to achieve some geographical and social mobility. Interviewed Nigerian sponsors explained that they migrated to Europe with the help of madams themselves in order to support their family at home. Eventually, some convicted participants perceived indentured sex work migration as an opportunity to also enable their family members' geographical and social mobility under their management. However, as explained by madams, their arrest resulted in loss of income and thus, their further social immobilisation.

Such immobilisation was likely to be perpetuated after their release, as they will remain unauthorised migrants in Italy. Within this context, it is important to consider that in accordance with Art. 13 D.lgs. 286/98 *Testo Unico sull'Immigrazione* (Consolidated Act of Provisions Concerning Immigration), convicted participants are subjected to administrative expulsion because they are regarded as a threat to the social order. Thus, after being released, madams' migration status becomes even more precarious and their social position is further marginalised. As unauthorised migrants, they face exclusion from legal employment and governmental support, which they may find by entering new indentured sex work migration relationships with fellow countrywomen.

The impact that migration laws and anti-trafficking interventions have on perpetuating trafficking actors' geographical and social immobility as unauthorised migrant sex workers points to the need to re-think prevention policies. These research findings suggest a need to understand actors' involvement as deeply intertwined with their migration experiences and thus, the most efficient preventive measure would be understanding both madams and other Nigerian women as migrants and support them as such.

Instead of securitising the movement of the Immobilised Global Underclass⁴⁴ by dividing migrant sex workers into victims and perpetrators, the experiences of the research sample point to a need to design joint interventions to address Nigerian women's socioeconomic hardship in Nigeria and mobility aspirations in Europe. On the one hand, as socioeconomic hardship in Nigeria was found to be conducive for both interviewed madams and identified victims' indentured migration, one of the most effective ways to counter their involvement is to invest in Nigeria so that would-be migrants will be able to achieve the lives they desire

⁴⁴ K F Aas, "Crimmigrant" Bodies and Bona Fide Travelers: Surveillance, citizenship and global governance', *Theoretical Criminology*, vol. 15, issue 3, 2011, pp. 331–346, <https://doi.org/10.1177/1362480610396643>.

for themselves and their families at home (if they wish).⁴⁵ Currently, US and European prevention actions mainly support awareness campaigns in countries of origin based on the assumption that would-be migrants are unaware of the risks of human trafficking and indentured relationships.⁴⁶ However, as this research shows too, individuals may be aware of the risky outcomes of migration but still choose to become involved as a way to overcome socioeconomic hardship at home where livelihood opportunities are almost absent due to a lack of resources and structural constraints.⁴⁷ Therefore, prevention interventions in Nigeria may benefit from investing funding to create more advantageous opportunities for citizens instead of only warning them about the potential risks of sponsored migration.

On the other hand, as migration plans and indentured relationships may also be a way for migrants to achieve personal success,⁴⁸ it is pivotal to work towards more open borders. In fact, strict migration regimes and crimmigration policies do not prevent trafficking but instead make individuals more vulnerable to it, as they are left to rely on informal migration enablers to move across borders.⁴⁹ Within current migration landscapes, indentured relationships provide individuals with the possibility to move beyond constraints imposed on their movement, even if affording an authorised life in Europe remains a restricted possibility for most of the Immobilised Global Underclass.⁵⁰ This was the context within which interviewed sponsors entered indentured relationships, both as migrants and madams.

This leads to two further reflections with regards to anti-trafficking policies, if European governments are still determined to fight indentured migration as a problem of traffickers rather than of strict migration regimes. In destination countries, an important anti-trafficking intervention would be to not immobilise already socially and geographically constrained individuals. Within strict and hostile migration regimes, unauthorised migrants can achieve some social mobility mostly when identified as trafficking victims (or granted asylum) through programmes

⁴⁵ N Mai, *The Psycho-social Trajectories of Albanian and Romanian 'Traffickers'*, ISET Working Paper 17, Institute for the Study of European Transformations (ISET), London Metropolitan University, 2010.

⁴⁶ K Sharapov, S Hoff, and B Gerasimov, 'Editorial: Knowledge is Power, Ignorance is Bliss: Public perceptions and responses to human trafficking', *Anti-Trafficking Review*, issue 13, 2019, pp. 1–11, <https://doi.org/10.14197/atr.201219131>.

⁴⁷ Andrijasevic and Mai, p. 1.

⁴⁸ R Andrijasevic, *Migration, Agency and Citizenship in Sex Trafficking*, Palgrave Macmillan, London, 2010; Hoyle *et al.*, p. 9; O'Connell Davidson, 2013, p. 3; Peano, p. 2; Testai, 'Debt as a Route', p. 2.

⁴⁹ Sharma, p. 4.

⁵⁰ *Ibid.*

of social protection.⁵¹ In accordance with Art. 18 D.Lgs 286/98, which regulates protection policies for victims of trafficking in Italy, identified victims are entitled to a residence permit and offered professional trainings in order to prepare them for the regulated labour market. However, those women who entirely repay their debt and are thus not under the control and at risk of violence by their traffickers, are not identifiable as victims. This is against the spirit of the 3P framework as it fails to recognise people's past victimisation and provide them support, thus becoming counterproductive to prevention and protection efforts. In fact, as Lo Iacono notes with regards to Nigerian trafficking actors, the moment after the debt repayment is the most crucial for sex workers who may identify new indentured relationships as a potential livelihood strategy in response to a lack of opportunities and access to social welfare.⁵² This was the case of my research participants who had exited indentured relationships by fully repaying their debt before becoming sponsors of co-nationals.

Lastly, it is pivotal to consider the applicability of the non-punishment principle for defendants with experiences of victimisation in trafficking. In accordance with Art. 8 of the EU Anti-Trafficking Directive 2011/36/EU, '[e]ach Party shall, in accordance with the basic principles of its legal system, provide for the possibility of not imposing penalties on victims for their involvement in unlawful activities, to the extent that they have been compelled to do so'.⁵³ This provision absolves defendants of their criminal responsibility if they engaged in criminal activities under coercion by their traffickers. In other national contexts, such as Argentina,⁵⁴ Australia,⁵⁵ and the US,⁵⁶ defendants' past victimisation is regarded as grounds for mitigating circumstances when sentencing them.

However, the Italian 24/2014 D.Lgs, which relates to the prevention and repression of trafficking in human beings and the protection of victims, does

⁵¹ S A FitzGerald, 'Trafficked Women's Presentation of Self Before the German Courts', *European Journal of Women's Studies*, vol. 27, issue 1, 2020, pp. 57–71, <https://doi.org/10.1177/1350506818819112>; Hoyle *et al.*, p. 9.

⁵² Lo Iacono, p. 4.

⁵³ *Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on Preventing and Combating Trafficking in Human Beings and Protecting Its Victims, and Replacing Council Framework Decision 2002/629/Jha*, 5 April 2011.

⁵⁴ Chatzis, p. 2.

⁵⁵ Baxter, p. 4.

⁵⁶ A F Levy, 'Innocent Traffickers, Guilty Victims: The case for prosecuting so-called "bottom girls" in the United States', *Anti-Trafficking Review*, issue 6, 2016, pp. 130–133, <https://doi.org/10.14197/atr.201216613>.

not include such non-punishment provision.⁵⁷ Notwithstanding that madams interviewed in the research context did not state that somebody compelled them to sponsor fellow countrywomen's travel and sex work, the failure of Italian legislation to adapt to the EU Directive shows the legal polarisation between victims and criminals. Participants' experiences demonstrate how victimisation and offending overlap and cannot be understood as either fully coerced or free.⁵⁸ Instead, it becomes pivotal to consider the structural constraints and lack of opportunities, which may influence unauthorised migrants' agency.⁵⁹ In this case, Nigerian women's experiences of victimhood and offending were characterised by both elements of agency and compulsion, which were grounded in social expectations and livelihood strategies.

One way to address such a legal gap is to implement the non-punishment provision in each national context and expand the EU Anti-Trafficking Directive requirement of 'being compelled to do so' by aligning the factors that may contribute to people's compulsion to offend with the means referred to in the trafficking definition.⁶⁰ Factors influencing individuals' involvement in indentured relationships (both as migrants and sponsors) should not only be found in *traffickers'* coercion but also in structural constraints.⁶¹ The suggested interventions would be in line with human rights principles, which state that '[t]rafficked persons shall not be detained, charged or prosecuted for the illegality of their entry into or residence in countries of transit and destination, or for their involvement in unlawful activities to the extent that such involvement is a direct consequence of their situation as trafficked persons'.⁶²

In this way, prevention and protection goals can be met by addressing interviewed madams' past victimisation as well as the reasons for criminal involvement.

⁵⁷ Associazione per gli Studi Giuridici sull'Immigrazione (Asgi), *Osservazioni relative allo stato di attuazione in Italia della direttiva 2011/36UE relativa alla prevenzione e la repressione della tratta di esseri umani e la protezione delle vittime e che sostituisce la decisione quadro del Consiglio 2002/629/GAI - Il decreto legislativo 4 marzo 2014 n. 24*, 2020, https://www.asgi.it/wp-content/uploads/2015/04/doc_LIBE.pdf.

⁵⁸ Lo Iacono, p. 4.

⁵⁹ Baxter, p. 4; Andrijasevic and Mai, p. 1.

⁶⁰ UN Human Rights Council, *Implementation of the non-punishment principle. Report of the Special Rapporteur on trafficking in persons, especially women and children*, A/HRC/47/34, 17 May 2021.

⁶¹ Chatzis, p. 2.

⁶² OHCHR, *Recommended Principles and Guidelines Principles and Guidelines on Human Rights and Human Trafficking* E/2002/68/Add.1, OHCHR, 2002.

Conclusion: Rebalancing the trafficking discourse

Human trafficking research is mainly generated in the field of victim assistance, and therefore, produces one-sided knowledge of the phenomenon. Such knowledge is mainly grounded in a standardised narrative of ‘ideal victimhood’, which practitioners often rely on to distinguish between ‘genuine’ and ‘deserving’ victims from unauthorised migrants.⁶³ For this reason, migrants have often been found to feel pressured to comply with the identity of fully-compromised victims, in order to be granted governmental support and avoid the risk of deportation, thereby perpetuating only one version of trafficking, which is inscribed in elements of exploitation and coercion.⁶⁴

This misbalanced understanding of the phenomenon is mirrored in anti-trafficking interventions that aim to prevent the crime from occurring, protect victims, and prosecute traffickers. However, as this paper shows, the accounts of women held responsible for trafficking illuminated a more nuanced reality where Nigerian sponsors’ and migrants’ involvement cannot be fully explained by either victimhood or actions perpetuated by ruthless criminal syndicates. Therefore, if governments aim to fight trafficking through the 3P framework, this research sample sheds light on the need to design more inclusive protection measures, such as non-punishment, provision of residence, and work permits.

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⁶³ Hoyle *et al.*, p. 9.

⁶⁴ FitzGerald, p. 12; Andrijasevic and Mai, p. 1; Hoyle *et al.*, p. 9.